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### EX PARTE

March 31, 1997

Mr. William F. Caton Secretary Federal Communications Commission Room 222 1919 M Street NW Washington, D.C. 20554

RECEIVED

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Federal Communications Commission
Office of Secretary

Re: CC Docket 96-45: Universal Service

Dear Mr. Caton:

On Friday, March 28, I provided copies of the attached material to Jon Garcia and Greg Rosston of the Office of Plans and Policy. While the material was developed by MCI for an FCC briefing on billing issues, it answers questions raised by Mr. Garcia in an earlier meeting on universal service concerning the size of the dial-around calling market.

Please include this letter and the enclosed copy on the record of this proceeding.

Sincerely,

Leonard S. Sawicki

**Attachment** 

CC:

Mr. Garcia

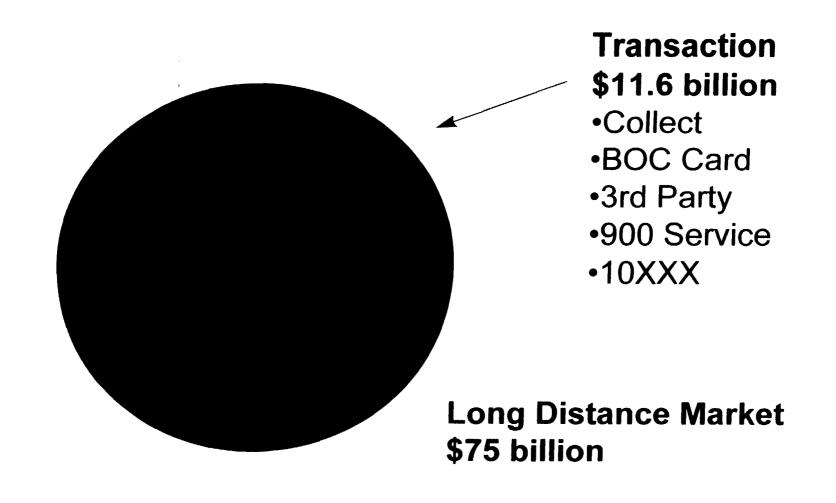
Mr. Rosston

No. of Copies rec'd OH List ABCDE

# NON-SUBSCRIBED SERVICES BILLING

March 28, 1997

# NON-SUBSCRIBED SERVICES COMPRISE A LARGE SEGMENT OF THE LONG DISTANCE MARKET



# NON-SUBSCRIBED SERVICES FULFILL CRITICAL NEEDS FOR CONSUMERS

### UBIQUITOUS AVAILABILITY

- Emergencies
- Alternative to Network Outages

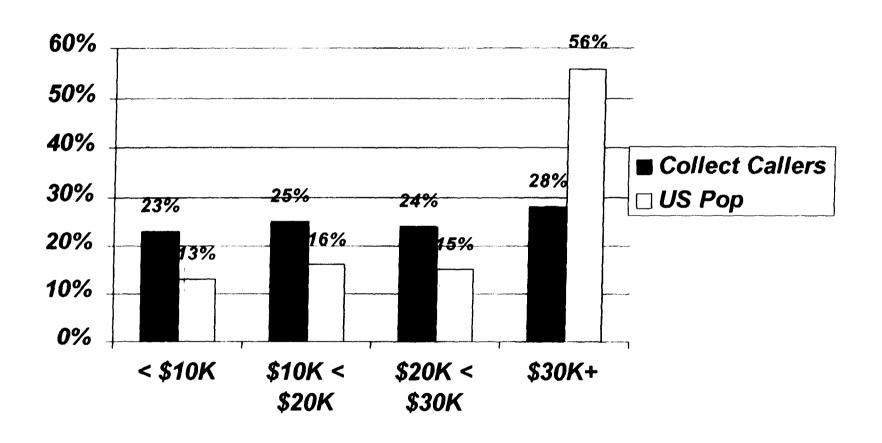
### SAMPLING WITHOUT CHANGING PIC

\$1.5B Revenue per year for 10XXX that are second tier carriers

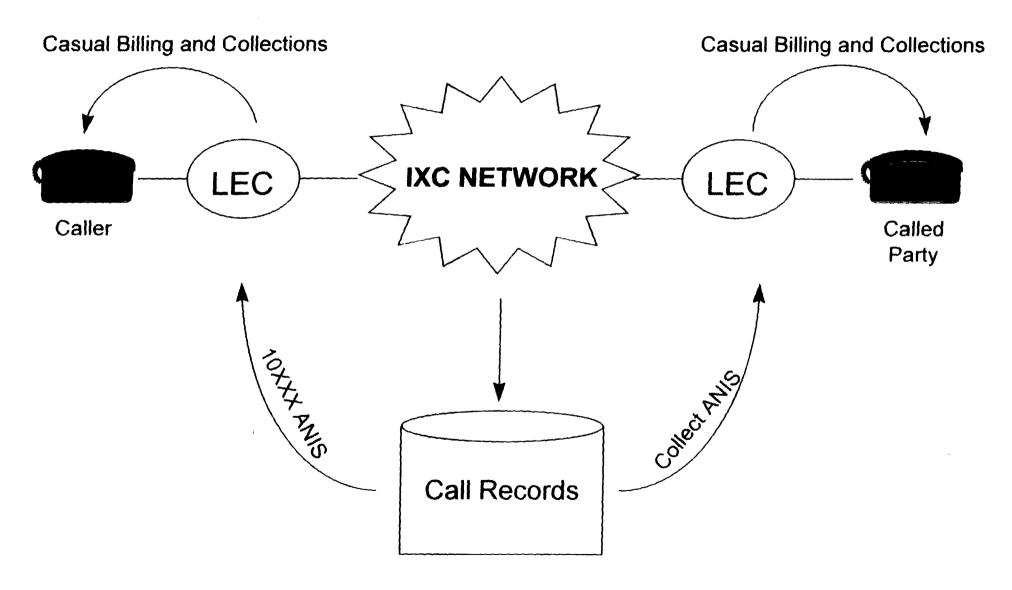
### REPUTABLE INFORMATION SERVICES

Weather, the Pope, Dow Jones

# ...AND ARE PRIMARILY USED BY LOWER INCOME HOUSEHOLDS



# CURRENT NON-SUBSCRIBED SERVICES ARE POSSIBLE BECAUSE OF CASUAL BILLING CONTRACTS



## THE NEW COMPETITIVE ENVIRONMENT DICTATES SIGNIFICANT CHANGES...

- CASUAL BILLING TO SOME CONSUMERS MIGHT NOT BE POSSIBLE
  - Optional for LECs to provide
- THE NUMBER OF LOCAL PROVIDERS WILL INCREASE
  - Further fragments casual bill outclearing
  - Challenges of what LEC to bill through when local PICs are churning daily
- FINDING THE BILL PAYER MIGHT NOT BE POSSIBLE
  - If no BNA from C-LECs

... UBIQUITY OF NON-SUBSCRIBED SERVICES
BILLING IS CHALLENGED

### LEC'S WHO RESTRICT CASUAL BILLING WILL STIFLE COMPETITION FROM OTHER NON-SUBSCRIBED SERVICE PROVIDERS

- CARRIERS FORCED TO DIRECT BILL WILL BE AT A TREMENDOUS COST DISADVANTAGE
- UBIQUITY ASSOCIATED WITH COLLECT CALLING WILL BEGIN TO FRAGMENT
  - Carriers will be forced to block calls that terminate in areas where casual billing doesn't exist
- INCREASED BILLING COSTS COULD ADVERSELY IMPACT RATES ON 10XXX AND COLLECT RATES